

From: [Algoe-Eakin, Amy](#)
To: [Peter, David](#); [Avey, Lance](#); [Hawkins, Andy](#); [Jay, Michael](#)
Subject: Fwd: SO2 Ambient Air Quality Characterization
Date: Tuesday, March 08, 2016 5:53:17 PM

Sent from my iPhone

Begin forwarded message:

From: "Moore, Kyra" <kyra.moore@dnr.mo.gov>
Date: March 8, 2016 at 4:36:37 PM CST
To: 'Amy Algoe-Eakin' <Algoe-Eakin.Amy@epamail.epa.gov>
Subject: FW: SO2 Ambient Air Quality Characterization

FYI

From: Whitworth, Steve C [<mailto:SWhitworth@ameren.com>]

Sent: Tuesday, March 08, 2016 4:31 PM

To: Moore, Kyra

Cc: Jay, Michael

Subject: Re: SO2 Ambient Air Quality Characterization

I can make it work. I'll check with Ken Anderson and let you know tomorrow.

Steve

Sent from my iPhone

On Mar 8, 2016, at 4:25 PM, Moore, Kyra <kyra.moore@dnr.mo.gov> wrote:

Steve,

Does Tuesday the 15th from 9 – 11 work for a conference call? I left you a voicemail as well.

Kyra

From: Whitworth, Steve C [<mailto:SWhitworth@ameren.com>]

Sent: Tuesday, March 08, 2016 8:30 AM

To: Jay, Michael

Cc: Moore, Kyra

Subject: Re: SO2 Ambient Air Quality Characterization

Mike - thanks for the follow up and my apologies for not responding sooner. I have been out of the office for about 10 days. I am traveling this morning but I will give you a call later today. I think it would be helpful if you, Kyra and I and our teams get together either in person or by conference call to discuss the data and next steps. I have availability this Friday as well as next week. Please let me know if you have a date and time preference.

Talk to you soon,

Steve

Sent from my iPhone

On Feb 25, 2016, at 2:17 PM, Jay, Michael <Jay.Michael@epa.gov> wrote:

Steve,
Left you a voicemail just so we could chat about your most recent
submittal. Give me a call if you can.
Mike Jay
Branch Chief
Air Planning and Development Branch
USEPA R7
913-551-7460

From: Whitworth, Steve C [<mailto:SWhitworth@ameren.com>]

Sent: Wednesday, February 24, 2016 4:13 PM

To: Jay, Michael <Jay.Michael@epa.gov>

Cc: Moore, Kyra <kyra.moore@dnr.mo.gov>
(kyra.moore@dnr.mo.gov) <kyra.moore@dnr.mo.gov>

Subject: SO2 Ambient Air Quality Characterization

Mike – Ameren submits the request below that is accompanied by
the attached file related to the air quality modeling
characterization for ambient SO2 concentrations in the vicinity of
the Labadie Energy Center.

On December 9, 2015, the Missouri Department of Natural
Resources submitted to Region VII the attached demonstration
materials that have been prepared in accordance with the
requirements of Section 3.2 of the Guideline on Air Quality Models
(Appendix W). Importantly, such alternative model demonstration
materials include a peer-reviewed scientific article prepared by
AECOM and published in the Journal of Air and Waste
Management. Additional articles on the Low Wind Speed have
been prepared by AECOM and are expected to be published
shortly in that scientific journal. The report that provides the basis
for the use of the low wind speed option has been previously
provided to MDNR and Region VII and is attached again to this e-
mail.

As USEPA Air Quality Assessment Division noted in its recent
memorandum ("Clarification of the Approval Process for
Regulatory Application of the AERMOD Modeling System Beta
Options", issued December 10, 2015); see
http://www3.epa.gov/ttn/scram/guidance/clarification/AERMOD_Beta_Options_Memo-20151210.pdf

"the incorporation of beta options is beneficial to the entire
stakeholder community, because these new models can be
scientifically reviewed and fully evaluated by the community
(thereby shortening the time it might take to otherwise formally
propose and adopt the new model option into a preferred
model)". This is particularly true in the case of the Ameren Labadie
Energy Center where, depending upon the AERMOD options
chosen, the model demonstrates either attainment or
nonattainment with the SO2 standard. Our modeling expert in this
matter, Mr. Robert Paine of AECOM, made presentations at both
the Tenth and Eleventh Modeling Conferences sponsored by EPA

and described how the AERMOD model contains a bias to over predict under stable/light wind conditions. EPA's proposed rulemaking acknowledges this over prediction bias, and its proposed low-wind beta options ("ADJ_U*" in AERMET and "LOWWIND3" in AERMOD) correct for this over prediction. The monitoring data collected by Ameren during 2015 reflects a significant over-prediction bias in the AERMOD model absent the low-wind corrections. In fact, QA/QC data collected from air monitors near Labadie and submitted to MDNR reflect air quality well below the 2010 SO2 NAAQs. Put simply, those results should be celebrated by EPA, not discounted or ignored. The low wind model options used by AECOM, as described in the attached materials, have been proposed for acceptance in EPA's pending rulemaking. Once that rulemaking is finalized, the low wind option would be included in the preferred model and can be used without the need for a Case-by-Case approval.

As the AQAD memorandum makes clear, the participation of the Model Clearinghouse allows for national consistency in approvals and complete transparency with the stakeholder community. Such transparency is particularly important here so that the entire stakeholder community can be assured that regulatory decisions are based on the appropriate technical merits. Accordingly, we hereby request the following: (1) a meeting with USEPA Region VII technical staff as soon as possible to discuss the alternative model demonstration; and (2) so as to assure complete transparency, that Region VII submit the above material and request for Case-By-Case approval to AQAD for review and approval as soon as possible in light of the pending designation decision.

As you are aware, the public comments period terminates in 30 days after publication in the federal register. Accordingly, Ameren is prepared to meet with Agency as soon as possible to discuss this issue.

Note that this information is also supplemented by our submittal made on February 16 that included updated information related to the modeling and monitoring characterization for ambient SO2 concentrations in the vicinity of the Labadie Energy Center.

Please contact me at your convenience in response to this submittal.

Best Regards,
Steve

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steven c. whitworth

Senior Director

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